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9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **OAKLAND DIVISION**

13 DIGITAL REG OF TEXAS, LLC,

14 Plaintiff,

15 vs.

16 ADOBE SYSTEMS INCORPORATED, et al.,

17 Defendants.
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Civil Case No. 12-CV-01971 CW (KAW)

**ADMINISTRATIVE MOTION TO
SEAL DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT
OF NONINFRINGEMENT BASED ON
DIGITAL REG'S LICENSE TO
MICROSOFT AND DECLARATION
OF A. ZVENIGORODSKY IN
SUPPORT THEREOF AND EXHIBITS
THERE TO**

Electronic Arts Inc. and Adobe Systems Incorporated submit this Administrative Motion for a sealing order pursuant to Civil Local Rule 79-5. This motion is based on the points and authorities herein, and on the accompanying Declaration of Nathan Greenblatt in Support of Administrative Motion to Seal (“Greenblatt Admin Decl.”), and the Declaration of Nathan Greenblatt in Support of Defendants’ Motion for Partial Summary Judgment Based on Digital Reg’s License to Microsoft (“Greenblatt Decl.”). Electronic Arts Inc. and Adobe Systems Incorporated respectfully request that the Court permit the following to be filed under seal:

1. The unredacted version of the Declaration of A. Zvenigorodsky in Support of Defendants’ Motion for Partial Summary Judgment of Noninfringement Based on Digital Reg’s License to Microsoft and exhibits thereto (a proposed partially redacted public version is being lodged with the Court).
2. The unredacted version of Defendants’ Motion for Partial Summary Judgment of Noninfringement Based on Digital Reg’s License to Microsoft (this exhibit contains information that has been designated as “Highly Confidential – Outside Counsel Only” by plaintiff Digital Reg; a proposed partially redacted public version is being lodged with the Court).
3. Exhibits 1, 2, 5, 10, 11, 13-19 to the Greenblatt Decl. (these exhibits have been designated as “Highly Confidential – Outside Counsel Only” or “Confidential” by plaintiff Digital Reg).

As grounds for the motion, Electronic Arts Inc. and Adobe Systems Incorporated state that the documents or portions of documents for which sealing is requested contain highly confidential information which could harm Electronic Arts Inc. if publicly disclosed, or contain information designated by plaintiff Digital Reg as “Highly Confidential – Outside Counsel Only” or “Confidential” under the terms of the protective order for this case. *See generally* Greenblatt Admin Decl. The documents listed above have been given particularized consideration, with attention to the Court’s policy of providing public access to the court proceedings. *See id.* Therefore Electronic Arts Inc. and Adobe Systems Incorporated respectfully request that the Court grant this motion.

1 Dated: June 25, 2013

Respectfully submitted,

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3 /s/ Nathan Greenblatt
Nathan Greenblatt

4 WEIL, GOTSHAL & MANGES LLP

5 Edward R. Reines
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